

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. 04-_____
	:	
v.	:	DATE FILED: _____
	:	
JOHN WILSON	:	VIOLATION:
a/k/a "Tommy Hill"	:	21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A) (distribution of cocaine base - 1 count)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. On or about October 1, 2003, at Philadelphia, in the Eastern District of Pennsylvania, defendant

JOHN WILSON,
a/k/a "Tommy Hill,"

knowingly and intentionally distributed more than 50 grams, that is, approximately 51.8 grams, of a mixture or substance containing a detectible amount of cocaine base (crack), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

NOTICE OF FORFEITURE

As a result of the violation of Title 21, United States Code, Section 841(a)(1), as set forth in the sole count of this Indictment, defendant

**JOHN WILSON,
a/k/a “Tommy Hill,”**

shall forfeit to the United States pursuant to Title 21, United States Code, Section 853: All property constituting, or derived from, any proceeds the defendant obtained, directly or indirectly, as the result of such violation, including but not limited to the following:

- (1) \$1,800 in United States currency, consisting of drug proceeds that the defendant obtained from the distribution of approximately 51.8 grams of cocaine to a government cooperating witness on October 1, 2003.
- (2) A man's watch valued at approximately \$40,000.00 seized from the defendant's person on October 9, 2003; and
- (3) \$2,415 in United States currency seized from the defendant's person on October 9, 2003.

SUBSTITUTE ASSETS

If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendant

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be divided
without difficulty;

then, it is the intent of the United States, pursuant to Title 21, United States Code, Section 854(p), to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property.

All pursuant to Title 21, United States Code, Sections 853 and 854.

A TRUE BILL:

GRAND JURY FOREPERSON

PATRICK L. MEEHAN
UNITED STATES ATTORNEY